

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REC ROOM, INC.,

Plaintiff,

V.

M.Z.,

Defendants.

Case No. 2:23-cv-01586-KKE

**JOINT STATUS REPORT AND JOINT
MOTION TO CONTINUE STAY**

**NOTE ON MOTION CALENDAR:
July 14, 2025**

JOINT STATUS REPORT AND MOTION TO CONTINUE STAY

The parties, through their undersigned counsel, hereby provide this Joint Status Report pursuant to the Court's order of May 15, 2025 [Dkt. No. 47]. The parties have drafted and come to an agreement of much of the settlement language and are nearing execution. The parties are working through final redlines of certain provisions but are optimistic that a potential final settlement is close.

We respectfully request that the Court continue the current stay for another two months to allow the parties to finalize settlement language and execute. We also request that the Court accordingly reset the deadline for the close of discovery to November 25, 2025. If for any

1 reason the parties have not finalized and executed a settlement agreement within the next two
 2 months, the parties will provide the Court a joint status report on September 25, 2025.
 3

4 DATED this 14th day July, 2025.
 5

6 /s/Brian W. Esler

7 Brian W. Esler, WSBA No. 22168

8 /s/Lane Conrad

9 Lane Conrad, WSBA No. 59287

10 /s/Nicholas Hesterberg

11 Nicholas Hesterberg, WSBA No. 41970

12 MILLER NASH LLP

13 605 5th Ave S, Ste 900

14 Seattle, WA 98104

15 Tel: (206) 624-8300

16 Email: brian.esler@millernash.com

17 lane.conrad@millernash.com

18 nick.hesterberg@millernash.com

19 *Attorneys for Plaintiff Rec Room, Inc.*

20 Akiva M. Cohen

21 Dylan M. Schmeyer

22 Kamerman, Uncyk, Soniker & Klein, P.C.

23 1700 Broadway, 16th Floor New York, NY

24 10019

25 719-930-5942

26 Email: acohen@kusklaw.com

27 dschmeyer@kusklaw.com

28 *Attorneys for Plaintiff Rec Room, Inc.*

29 /s/Denise L. Ashbaugh

30 Denise L. Ashbaugh

31 /s/Jonah O. Harrison

32 Jonah O. Harrison

33 /s/ Jeremy E. Roller

34 Jeremy E. Roller

35 ARETE LAW GROUP, PLLC

36 600 University Street, #2420

37 Seattle, WA 98101

38 Telephone: (206) 428.3250

39 Email: dashbaugh@aretelaw.com

40 jharrison@aretelaw.com

41 jroller@aretelaw.com

42 *Attorney for Defendant M.Z.*

1 CERTIFICATE OF SERVICE
2
3
4
5

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using
the CM/ECF system which will send notification of such filing to the attorneys of record for the
parties and to the following:

Denise L. Ashbaugh, WSBA No. 28512
Jeremy E. Roller, WSBA No. 32021
Jonah O. Harrison, WSBA No. 34576
ARETE LAW GROUP PLLC
1218 Third Avenue, Suite 2100
Seattle, WA 98101
Phone: (206) 428-3250
Fax: (206) 428-3251
dashbaugh@aretelaw.com
jroller@aretelaw.com
jharrison@aretelaw.com

12
13 Attorneys for Plaintiff M.Z.
14
15
16

DATED this 14th day of July, 2024.

17 /s/Catherine Berry
18 Catherine Berry, Legal Assistant
19
20
21
22
23
24
25
26